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ELECTRONICALLY FILED BY
BELDING, HARRIS & PETRONI, LTD.
ON 1/25/11

6 UNITED STATES BANKRUPTCY COURT

7 DISTRICT OF NEVADA

8 * * * * *

9 IN RE:

BK-10-53281
(Chapter 11)

10 PETER G. LAHNER and BRENDA
11 M. LAHNER, husband and wife,

**DEBTORS' REPLY TO UMPQUA BANK'S
OBJECTION TO DEBTORS' CLAIM OF
EXEMPTION**

12 Debtors.

13 Hrg. DATE: February 9, 2011
Hrg. TIME: 10:00 a.m.

14 /
15 PETER G. LAHNER and BRENDA M. LAHNER, Debtors and Debtors-in-Possession
16 herein ("Debtors"), by and through their attorney STEPHEN R. HARRIS, ESQ. of BELDING,
17 HARRIS & PETRONI, LTD., hereby file their DEBTORS' REPLY TO UMPQUA BANK'S
18 OBJECTION TO DEBTORS' CLAIM OF EXEMPTION, and allege as follows:

19 1. On October 22, 2010, Umpqua Bank ("Umpqua") filed its OBJECTION TO
20 DEBTORS' CLAIM OF EXEMPTION (Docket No. 26) ("Objection").

21 2. Debtors have claimed their common stock ownership in ALPINE AUTO
22 SERVICE, INC., a Nevada corporation, as exempt pursuant to NRS 21.090(1)(bb) which Debtors
23 claim a value of \$100,000 in their Schedules filed on September 9, 2010, as Docket No. 15.
24 Umpqua's primary objection to the claimed stock exemption is that there has to be more than one
25 shareholder, but fewer than one hundred shareholders of record at any time. Both Debtors are
26 shareholders in ALPINE AUTO SERVICE, INC., by reason of their joint ownership of Stock
27 Certificate No. 1 for 1,000 shares. A copy of Stock Certificate No. 1 is attached hereto as Exhibit "A"
28 and incorporated herein by that reference. Therefore, Debtors' common stock in ALPINE AUTO

1 SERVICE, INC. is exempt because there is more than one shareholder, in that Debtors together
2 represent two (2) shareholders in ALPINE AUTO SERVICE, INC.

3 WHEREFORE, Debtors request that Debtors' exemption with respect to their stock
4 ownership in ALPINE AUTO SERVICE INC., be sustained, and that Umpqua's Objection be denied.

5 DATED this 25th day of January, 2011.

6 STEPHEN R. HARRIS, ESQ.
7 BELDING, HARRIS & PETRONI, LTD.
8 417 West Plumb Lane
Reno, Nevada 89509

9 /s/ Stephen R. Harris
10 Attorney for Debtors

EXHIBIT “A”

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